EXHIBIT L

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Attorneys for GOOGLE LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

GOOGLE LLC,
 	
                    Plaintiff
 	
        v.
 	
SONOS, INC.,
 	
                    Defendant.
	Case No. 3:20-cv-06754-WHA

GOOGLE LLC'S OBJECTIONS AND RESPONSES TO
SONOS, INC.'S FIRST SET OF REQUESTS FOR ADMISSION (NOS. 1-12)

Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Google LLC ("Google") hereby objects and responds to Sonos, Inc.'s ("Sonos") First Set of Requests for Admission ("Requests"). Google responds to these Requests based on its current understanding and the information reasonably available to Google at the present time. Google reserves the right to supplement these responses if and when additional information becomes available.

1.   These responses are made only for the purposes of discovery in this action. Each response is subject to all appropriate objections as to competence, relevance, materiality, and any and all other objections and grounds that would require the exclusion of any information,

OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1

Admit that each Cast-Enabled Media Player includes hardware (e.g., a Wi-Fi interface) that enables the Cast-Enabled Media Player to connect to a Wi-Fi network. See, e.g., GOOG-SONOSWDTX-00051429 at 36; https://store.google.com/us/product/google_nest_mini_specs?hl=en-US ("Connectivity: 802.11b/g/n/ac (2.4 GHz/5 GHz) Wi-Fi").

OBJECTIONS AND RESPONSE: Google incorporates by reference all of its General Objections as if fully set forth herein. Google further objects to the terms "hardware," "enables" and "connect" as vague and ambiguous. Google further objects to this Request as compound because it requests an admission for "each Cast-Enabled media Player," which includes at least 13 devices: "Google's Chromecast, Chromecast Ultra, Chromecast Audio, Chromecast with Google TV, Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Audio, and Nest Wifi Point media players, individually and collectively, as they existed on and after May 8, 2018."

Subject to and without waiving the foregoing General and Specific objections, Google responds, as follows: Admit that the webpage https://store.google.com/us/product/google_nest_mini_specs?hl=en-US indicates "802.11b/g/n/ac (2.4GHz/5 GHz) Wi-Fi" under the heading Connectivity. Admit that GOOG-SONOSWDTX-00051429 at 36 is a sheet named "WLAN+BT."

Otherwise denied.

REQUEST FOR ADMISSION NO. 2

Admit that each Cast-Enabled Media Player includes one or more processors, such as a central processing unit (CPU). See, e.g., GOOG-SONOSWDTX-00051429 at 33; https://store.google.com/us/product/google_nest_mini_specs?hl=en-US ("Processor[:] Quad-core 64-bit ARM CPU 1.4 GHz").

OBJECTIONS AND RESPONSE: Google incorporates by reference all of its General Objections as if fully set forth herein. Google further objects to the terms "processor" and "central

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1   processing unit (CPU)" as vague and ambiguous. Google further objects to this Request as

2   compound because it requests an admission for "each Cast-Enabled media Player," which includes

3   at least 13 devices: "Google's Chromecast, Chromecast Ultra, Chromecast Audio, Chromecast

4   with Google TV, Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub

5   Max, Nest Audio, and Nest Wifi Point media players, individually and collectively, as they existed

6   on and after May 8, 2018."

7   Subject to and without waiving the foregoing General and Specific objections, Google

8   responds, as follows: Admit that the webpage

9   https://store.google.com/us/product/google_nest_mini_specs?hl=en-US indicates "Quad-core 64-

10 bit ARM CPU 1.4 GHz" under the heading Processor. Admit that GOOG-SONOSWDTX-

11 00051429 at 33 is a sheet named "SoC." Admit that each Cast-Enabled media Player includes at

12 least one processor.

13   Otherwise denied.

14   **REQUEST FOR ADMISSION NO. 3**

15   Admit that each Cast-Enabled Media Player includes memory that stores computer

16 program instructions, such as Flash memory and/or ROM. See, e.g., GOOG-SONOSWDTX-

17 00051429 at 34-35.

18   **OBJECTIONS AND RESPONSE:** Google incorporates by reference all of its General

19 Objections as if fully set forth herein. Google further objects to the terms "memory," "computer

20 program instructions," "Flash memory," and "ROM" as vague and ambiguous. Google further

21 objects to this Request as compound because it requests an admission for "each Cast-Enabled

22 media Player," which includes at least 13 devices: "Google's Chromecast, Chromecast Ultra,

23 Chromecast Audio, Chromecast with Google TV, Home Mini, Nest Mini, Home, Home Max,

24 Home Hub, Nest Hub, Nest Hub Max, Nest Audio, and Nest Wifi Point media players,

25 individually and collectively, as they existed on and after May 8, 2018."

26   Subject to and without waiving the foregoing General and Specific objections, Google

27 responds, as follows: Admit that each Cast-Enabled Media Player includes memory that can store

28 computer program instructions, such as Flash memory and/or ROM. Admit that

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1   GOOG-SONOSWDTX-00051429 at 34-35 are sheets named "DDR3" and "NAND."

2   Otherwise denied.

3   **REQUEST FOR ADMISSION NO. 4**

4   Admit that each Cast-Enabled Media Player can output audio either (i) in the form of

5   sound waves from one or more integrated speakers or (ii) in the form of an audio signal that is

6   provided to a device (e.g., a TV) connected to the Cast-Enabled Media Player. See, e.g.,

7   https://store.google.com/us/product/google_nest_mini?hl=en-US ("Play your go-to music,

8   podcasts and more. Stream your favorite audio content on the improved speaker and create a home

9   audio system with other Nest speakers.");

10   https://store.google.com/us/product/google_nest_mini_specs?hl=en-US ("Speakers[:] 360-degree

11   sound with 40 mm driver"); https://support.google.com/chromecast/answer/3212934 ("You can

12   connect Chromecast to your TV in a few simple steps.").

13   **OBJECTIONS AND RESPONSE:** Google incorporates by reference all of its General

14   Objections as if fully set forth herein. Google further objects to the terms "can output," "in the

15   form of," "integrated speakers," "provided to," and "connected to" as vague and ambiguous.

16   Google further objects to this Request as compound because it requests an admission for "each

17   Cast-Enabled media Player," which includes at least 13 devices: "Google's Chromecast,

18   Chromecast Ultra, Chromecast Audio, Chromecast with Google TV, Home Mini, Nest Mini,

19   Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest Audio, and Nest Wifi Point media

20   players, individually and collectively, as they existed on and after May 8, 2018."

21   Subject to and without waiving the foregoing General and Specific objections, Google

22   responds, as follows: Admit that the webpage

23   https://store.google.com/us/product/google_nest_mini?hl=en-US states "Play your go-to music,

24   podcasts and more. Stream your favorite audio content on the improved speaker and create a home

25   audio system with other Nest speakers." Admit that the webpage

26   https://store.google.com/us/product/google_nest_mini_specs?hl=en-US states "360-degree sound

27   with 40mm driver" under the "Speakers & mics" heading. Admit that the webpage

28   https://support.google.com/chromecast/answer/3212934 states "You can connect Chromecast to

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1   your TV in a few simple steps. It's important to use the cords and adapters that come inside the

2   Chromecast box" under the heading "Plug in Chromecast."

3   Admit that each Cast-Enabled Media Player can output audio either (i) in the form of

4   sound waves from one or more integrated speakers and/or (ii) in the form of an audio signal that is

5   provided to a device connected to the Cast-Enabled Media Player.

6   Otherwise denied.

7   **REQUEST FOR ADMISSION NO. 5**

8   Admit that each Cast-Enabled Media Player can perform one or more processing functions

9   (e.g., decrypting audio data, decompressing audio data, performing digital-to-analog conversion,

10   and/or performing digital signal processing functions) that facilitate the Cast-Enabled Media

11   Player to output audio.

12   **OBJECTIONS AND RESPONSES:** Google incorporates by reference all of its General

13   Objections as if fully set forth herein. Google further objects to the terms "perform," "processing

14   functions," "facilitate" and "output audio" as vague and ambiguous. Google further objects to this

15   Request as compound because it requests an admission for "each Cast-Enabled media Player,"

16   which includes at least 13 devices: "Google's Chromecast, Chromecast Ultra, Chromecast Audio,

17   Chromecast with Google TV, Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub,

18   Nest Hub Max, Nest Audio, and Nest Wifi Point media players, individually and collectively, as

19   they existed on and after May 8, 2018."

20   Subject to and without waiving the foregoing General and Specific objections, Google

21   responds, as follows: Admit that each Home Mini, Nest Mini, Home, Home Max, Home Hub,

22   Nest Hub, Nest Hub Max, Nest Audio, and Nest Wifi Point media player can play audio, and

23   Google's Chromecast, Chromecast Ultra, Chromecast Audio, and Chromecast with Google TV

24   can interface with a compatible device to play audio.

25   **REQUEST FOR ADMISSION NO. 6**

26   Admit that each Cast-Enabled Media Player can be added to a Speaker Group. See, e.g.,

27   https://support.google.com/googlenest/answer/7174267; Google LLC's Third Supplemental

28   Objections and Responses to Plaintiff Sonos, Inc.'s First Set of Fact Discovery Interrogatories

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1 Built-In, firmware or other software that enables the creation and management of speaker groups

2 with these devices.[1]

3   Otherwise denied.

4   **REQUEST FOR ADMISSION NO. 9**

5   Admit that each Cast-Enabled Media Player can receive a message (referred to by Google

6 as a "join_group" message), over a Wi-Fi network from a device running the Google Home app,

7 that instructs the Cast-Enabled Media Player that it has been added to a Speaker Group. See, e.g.,

8 Google LLC's Third Supplemental Objections and Responses to Plaintiff Sonos, Inc.'s First Set of

9 Fact Discovery Interrogatories (Nos. 13, 14, 15) at 9 ("A message that is received by a group

10 member during configuration of the speaker group is a join_group command. The join_group

11 command instructs the device to join a group, and it may be received from a device using the Cast

12 protocol…. In the Google Home app, a user may select a specific device and add it to a group in

13 Home app, which causes the Google Home app to send a join_group command to that device.").

14   **OBJECTIONS AND RESPONSES:** Google incorporates by reference all of its General

15 Objections as if fully set forth herein. Google further objects to this Request as compound

16 because it requests an admission for "each Cast-Enabled media Player," which includes at least 13

17 devices: "Google's Chromecast, Chromecast Ultra, Chromecast Audio, Chromecast with Google

18 TV, Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub Max, Nest

19 Audio, and Nest Wifi Point media players, individually and collectively, as they existed on and

20 after May 8, 2018."

21   Subject to and without waiving the foregoing General and Specific objections, Google

22 responds, as follows: Admit that Google LLC's Third Supplemental Objections and Responses to

23 Plaintiff Sonos, Inc.'s First Set of Fact Discovery Interrogatories (Nos. 13, 14, 15) at 9 state "[a]

24 message that is received by a group member during configuration of the speaker group is a

25 join_group command. The join_group command instructs the device to join a group, and it may be

26

27 _____
[1] https://support.google.com/chromecast/answer/7174267?hl=en-
28 AU&co=GENIE.Platform%3DAndroid

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1   received from a device using the Cast protocol…. In the Google Home app, a user may select a

2   specific device and add it to a group in Home app, which causes the Google Home app to send a

3   join_group command to that device." <mark>Admit that the Cast-Enabled Media Player may interface</mark>

4   <mark>with a Wi-Fi network.</mark>

5   Otherwise denied.

6   **REQUEST FOR ADMISSION NO. 10**

7   Admit that each Cast-Enabled Media Player can join a Speaker Group before that Speaker

8   Group is caused to synchronously output audio. *See, e.g., id*. at 9 ("If a group has been created, the

9   devices in the group use a record of the group name and its unique identifier, which may be

10   referred to as being in a prefs file…. A launch request is one of the messages that a leader may

11   receive at the time that a Cast session is launched with a group.").

12   **OBJECTIONS AND RESPONSES:** Google incorporates by reference all of its General

13   Objections as if fully set forth herein. Google further objects to the terms "perform," processing

14   functions, and "facilitate" as vague and ambiguous. Google further objects to this Request as

15   compound because it requests an admission for "each Cast-Enabled media Player," which includes

16   at least 13 devices: "Google's Chromecast, Chromecast Ultra, Chromecast Audio, Chromecast

17   with Google TV, Home Mini, Nest Mini, Home, Home Max, Home Hub, Nest Hub, Nest Hub

18   Max, Nest Audio, and Nest Wifi Point media players, individually and collectively, as they existed

19   on and after May 8, 2018."

20   Subject to and without waiving the foregoing General and Specific objections, Google

21   responds, as follows: Admit that Google LLC's Third Supplemental Objections and Responses to

22   Plaintiff Sonos, Inc.'s First Set of Fact Discovery Interrogatories (Nos. 13, 14, 15) at 9 state "[i]f a

23   group has been created, the devices in the group use a record of the group name and its unique

24   identifier, which may be referred to as being in a prefs file…. A launch request is one of the

25   messages that a leader may receive at the time that a Cast session is launched with a group.").

26   Otherwise denied.

27

28